



LUCIANO RACCO

COUNSEL
CO-CHAIR, INTERNATIONAL TRADE & NATIONAL SECURITY

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Clients come to me for direct, practical advice that is free of unhelpful hedging so they can make informed decisions about how to run their businesses.

Lu Racco is the co-chair of Foley Hoag's International Trade & National Security practice. He advises clients on a wide range of international trade regulations, including sanctions and export controls under the Export Administration Regulations (EAR), Foreign Trade Regulations (FTR), International Traffic in Arms Regulations (ITAR), and Office of Foreign Assets Control (OFAC) regulations.

Lu also routinely counsels clients on the Committee on Foreign Investment in the United States (CFIUS) regulations, anti-boycott laws, Withhold Release Orders (WROs), and anti-corruption laws including the Foreign Corrupt Practices Act (FCPA).

He provides clients with a variety of trade compliance services, such as: transaction-related due diligence; counseling on, and the preparation of, filings to CFIUS; determining the export classifications of products; advising on and preparing export license applications; providing advice and counsel on a wide range of sanctions questions; complying with, and challenging WROs and findings of forced labor by Customs and Border Protection (CBP); delivering compliance training; and helping clients design and implement tailored international trade compliance policies and procedures. In addition, Lu has conducted hundreds of internal investigations related to potential violations of international trade compliance regulations and has extensive experience drafting voluntary disclosures to relevant agencies. He has significant experience responding to inquiries and enforcement actions from government agencies.

Lu has first-hand knowledge of the challenges clients face when implementing international trade compliance programs, having served as Assistant General Counsel - Global Trade at Raytheon Technologies' Collins Aerospace division, as well as its Pratt & Whitney division. Lu led an international trade compliance internal audit program, developing risk assessments and conducting numerous compliance audits related to sanctions and export control requirements. Prior to Raytheon Technologies, Lu practiced at an international law firm in Washington, D.C., and a Connecticut-based law firm where he focused on international trade compliance and investigations.

RELATED PRACTICES

[International Trade & National Security >](#)

[Russia & Belarus Sanctions >](#)

[White Collar Crime & Government Investigations >](#)

EDUCATION

- Vanderbilt University Law School, J.D., 2008
- College of the Holy Cross, B.A., Economics and History, with college honors, Phi Beta Kappa, 2004

BAR AND COURT ADMISSIONS

BAR ADMISSIONS

- Connecticut
- District of Columbia
- New York

LANGUAGES

- Italian

EXPERIENCE

- Assisted medical device company developing home diagnostic platform for the detection and management of COVID-19 and other infectious diseases with developing comprehensive international trade compliance program
- Advised numerous multi-national companies on compliance with complex sanctions and export controls imposed on Russia and Belarus
- Conducted sanctions investigation for Fortune 500 information technology services and consulting company concerning potential violations of OFAC sanctions by a newly-acquired subsidiary
- Secured CFIUS clearance for a U.S. quantum computing software company in connection with funding obtained from a group of non-U.S. investors
- Secured CFIUS clearance for electronics manufacturer, including ITAR-controlled items, in connection with its acquisition by a non-U.S. conglomerate
- Representing manufacturer in petitioning CBP to modify WRO
- Conducted comprehensive export classification review for leading software and services company
- Led international trade compliance due diligence for multiple Fortune 500 companies in connection with strategic acquisitions
- Core member of investigation team in one of the largest FCPA investigations in U.S. history

PROFESSIONAL EXPERIENCE

- Raytheon Technologies (Collins Aerospace and Pratt & Whitney divisions), Assistant General Counsel – Global Trade
- Led international trade compliance internal audit program for 70,000-employee company
- Helped guide United Technologies Corporation through its Consent Agreement with the Department of State for export controls violations as both outside and in-house counsel

HONORS & INVOLVEMENT

HONORS

- Outstanding Achievement Award from Washington Lawyers' Committee for Civil Rights and Urban Affairs for landmark settlement with the State of Virginia concerning accommodations for deaf inmates in its prisons

INVOLVEMENT

- American Bar Association
- Connecticut Bar Association
- District of Columbia Bar Association
- Holy Cross Lawyers Association – Board of Directors
- Society for International Affairs
- The Q. Walter Peabody Foundation – President, Chairman of the Board of Directors

SPEAKING ENGAGEMENTS

- Panelist, "Best Practices when Juggling your Growing Trade Compliance Demands," Massachusetts Export Center's Export Expo (January 2023)
- "Navigating Russian and Ukrainian IP Issues," San Francisco Intellectual Property Law Association / New York Intellectual Property Law Association (May 2022)
- "Corporate Transparency Act: Beneficial Owner Reporting Requirements, Penalties, FinCEN Proposed Rules," Stratford (March 2022)
- "Quantum Law Workshop on Export Controls/CFIUS," QED-C (March 2022)
- "What Every Startup Needs to Know about Export Controls," Tech GC Roundtable (February 2022)
- "Human Rights Issues in Your Supply Chain: Compliance Risks from Withhold Release Orders and the Uyghur Forced Labor Prevention Act," Massachusetts Export Center's Export Expo (January 2022)
- "Best Practices in Compliance Risk Assessments," Massachusetts Export Center's Export Expo (January 2021)

